

1 REBECCA J. WINTHROP(CA Bar No. 116386)
2 ROBIN D. BALL (CA Bar No. 159698)
3 NORTON ROSE FULBRIGHT US LLP
4 555 South Flower Street, Forty-First Floor
5 Los Angeles, California 90071
6 Telephone: (213) 892-9200
7 Facsimile: (213) 892-9494
8 rebecca.winthrop@nortonrosefulbright.com
9 robin.ball@nortonrosefulbright.com

10 Attorneys for Creditors ADVENTIST HEALTH
11 SYSTEM/WEST, and FEATHER RIVER HOSPITAL
12 d/b/a ADVENTIST HEALTH FEATHER RIVER

13 **UNITED STATES BANKRUPTCY COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **SAN FRANCISCO DIVISION**

16 In re:

17 PG& E CORPORATION

18 - and -

19 PACIFIC GAS AND ELECTRIC
20 COMPANY,

21 Debtors.

Case No. 19 – 30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF REBECCA J.
WINTHROP IN SUPPORT OF MOTION OF
ADVENTIST HEALTH SYSTEM/WEST AND
ADVENTIST HEALTH FEATHER RIVER TO
FILE CERTAIN DOCUMENTS UNDER SEAL
AND IN REDACTED FORM IN SUPPORT OF
THEIR OPPOSITION TO MOTION OF FIRE
VICTIM TRUSTEE PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 2004 FOR ENTRY OF AN
ORDER AUTHORIZING DISCOVERY FROM
ADVENTIST HEALTH SYSTEM/WEST AND
ADVENTIST HEALTH FEATHER RIVER
AND SERVICE OF A SUBPOENA ON
FACTORY MUTUAL INSURANCE
COMPANY**

- 22 ☐ Affects PG&E Corporation
23 ☐ Affects Pacific Gas and Electric
24 Company
25 ☒ Affects both Debtors

[No Hearing Requested]

26 ** All papers shall be filed in the Lead*
27 *Case, No. 19-30088 (DM).*

1 I, Rebecca J. Winthrop, declare as follows:

2 1. I am an attorney, licensed to practice before all courts in the State of California. I
3 am Of Counsel in the law firm of Norton Rose Fulbright US LLP, and one of the attorneys
4 primarily responsible for the representation of Adventist Health System/West (“Adventist
5 Health”) and Feather River Hospital, d/b/a Adventist Health (“AHFR,” and together with
6 Adventist Health, “Adventist”). Unless otherwise noted, I know the following facts of my own
7 personal knowledge, and if called upon as a witness to this proceeding, I would and could
8 competently testify thereto under oath. I submit this Declaration in support of the *Motion of*
9 *Adventist Health System/West and Adventist Health Feather River to File Certain Documents*
10 *Under Seal and In Redacted Form in Support of Their Opposition to Motion of the Fire Victim*
11 *Trustee Pursuant to Federal Rule of Bankruptcy Procedure Rule 2004 for Entry of an Order*
12 *Authorizing Discovery From Adventist Health System/West and Adventist Health Feather River*
13 *and Service of a Subpoena on Factory Mutual Insurance Company* (the “Motion to Seal”).

14 2. Each of the Confidential Documents¹ was submitted to the Fire Victim Trust
15 Portal for consideration by the Trust in connection with Adventist’s claim against the Trust, and
16 with the understanding that it would be kept confidential as required by Section 2.5 of the Trust
17 Agreement. Certain of the Confidential Documents also contain sensitive or confidential
18 commercial information, including with respect to the damages and losses Adventist has suffered
19 as a result of the Camp Fire, the substantial business operations Adventist once had in Paradise,
20 CA, and the nature and extent of insurance coverage which Adventist carried on its business and
21 operations at the time of the fire and the issues Adventist has confronted with respect to the
22 coverage being provided under such policy. The disclosure of such information would likely
23 harm the interests of Adventist and create an unfair advantage for other Fire Victim Claimants, as
24 well as be contrary to the terms of the Trust Documents. Accordingly, Adventist seeks to keep
25 the Confidential Documents and the information contained therein confidential.

26 ///

27 ///

28

¹ Terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion to Seal.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 23rd day of November, 2021, in Los Angeles, California.

4
5 /s/ Rebecca J. Winthrop
6 REBECCA J. WINTHROP
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28